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May 7, 2020

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**RE: Consejo de la Salud de la Comunidad la Playa de Ponce, Inc., now Med Centro Inc. v. Hon. Lorenzo Gonzalez as Secretary of the Department of Health of the Commonwealth of Puerto Rico (the “Commonwealth”), Case No. 06-1260 (GAG)**

On April 15, 2020, we wrote you as to the case of reference, regarding the Settlement of October 6, 2011 and the subsequent stipulation of July 31, 2019 for the modification of the automatic stay, in order for the Commonwealth of Puerto Rico (the “Commonwealth”) to continue

making the estimated quarterly wraparound payments (the “Quarterly Payments”) to Med Centro, Inc. (“Med Centro”) under Title XIX of the Social Security Act, 42 U.S.C. § 1396 et. seq., advising you of Med Centro’s intent to seek further relief from the automatic stay to prosecute a request for the calculation of its prospective payment system per visit rate utilizing the applicable rate from 2009 forward, pursuant to 42 U.S.C. § 1396 (bb)(3).

Following the provisions of the Eleventh Amended Notice Case Management and Administrative Procedures Order of February 28, 2020, and considering the lockdown existing at that time, we advised you of the need to confer telephonically to attempt to resolve Med Centro’s intended request within fifteen (15) days, providing you with the telephone number where I could be reached. I can also be reached now at my regular office number.

Only Susana I. Peñagaricano-Brown communicated with us on April 20, 2020, indicating that she would review our correspondence, discuss it with her client and get back as soon as feedback was received from AAFAF/ FOMB.

As a courtesy, we are hereby granting you until May 12, 2020, to respond to our request for modification of the automatic stay for the purposes indicated above, prior to moving the Court.

Cordially,



Charles A. Cuprill-Hernández

cc. Mr. Allan Cintrón Salichs

Ignacio Fernández de Lahongrais, Esq.

MVB